

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>JENNIFER AMI HOFFMAN</b>	:	
<b>fdba Hoffman Law Offices,</b>	:	<b>CASE NO. 1:17-bk-02956</b>
<b>Debtor</b>	:	
	:	
<b>JENNIFER AMI HOFFMAN</b>	:	
<b>fdba Hoffman Law Offices,</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>THE CLUBS AT COLONIAL RIDGE,</b>	:	
<b>Respondent</b>	:	

**MOTION TO AVOID LIEN OF RESPONDENT**  
**UNDER SECTION 522(f) OF THE BANKRUPTCY CODE**

COMES NOW the Debtor, by and through Dorothy L. Mott, Esquire and makes this Motion respectfully stating in support thereof:

1. The Debtor filed a Chapter 13 Petition on July 18, 2017.
2. The Debtor is an adult individual residing at 5341 Devonshire Road Harrisburg, PA 17112.
3. Respondent maintains a mailing address of 4901 LINGLESTOWN ROAD, HARRISBURG, PA 17112.
4. The Respondent holds a judicial lien against the Debtor in the amount of \$876.78 entered in Dauphin County at docket number # 2016-CV-8783.
5. The Debtor has listed all property the Debtor owns on the Bankruptcy schedules.
6. All property listed by the Debtor has been exempted as follows:

Asset	Value	Lien	Exemption	Equity
5341 Devonshire Rd, Harrisburg, PA 17112	\$225,000.00	\$175,444.91	11 U.S.C. § 522(b)(3)(B)	\$49,555.09 (tenants by the entirety)

7. No one has challenged either the value of the property or the exemption claimed.

8. The Respondent does not have a purchase money security interest in household goods, or a possessory interest.
9. The judgment of the Respondent impairs the exemption of the Debtor under Section 522(d) of the Bankruptcy Code. The judgment is a judicial lien.
10. The Debtor seeks under Section 522(f) of the Bankruptcy Code to avoid the lien of the Respondent.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order avoiding the aforesaid lien under Section 522(f) of the Bankruptcy Code and granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire  
Attorney ID#43568  
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125 State Street  
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fdba Hoffman Law Offices,	:	CASE NO. 1:17-bk-02956
Debtor	:	
	:	
JENNIFER AMI HOFFMAN	:	
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THE CLUBS AT COLONIAL RIDGE,	:	
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	:	
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<b>Respondent</b>	:	

**CERTIFICATE OF SERVICE**

I, Dorothy L. Mott, hereby certify that on October 24, 2024, I served a copy of the notice and Motion to Avoid Lien electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows:

JACK N. ZAHAROPOULOS Esquire, Trustee ( via ECF)

THE CLUBS AT COLONIAL RIDGE  
4901 LINGLESTOWN ROAD  
HARRISBURG, PA 17112

.

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire  
Attorney ID#43568  
Dorothy L Mott Law Office, LLC  
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**UNITED STATES BANKRUPTCY COURT**  
**MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Chapter:13

Jennifer Ami Hoffman  
fdba Hoffman Law Offices  
Debtor

Case number:1:17-bk-02956

Matter: Motion to Avoid Lien

Jennifer Ami Hoffman  
fdba Hoffman Law Offices  
Movant

vs,

THE CLUBS AT COLONIAL RIDGE  
Respondent

**Notice**

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection or other matter without further notice or hearing unless a party in interest files an objection/response within twenty-one (21) days of the date of the notice. If you object to the relief requested, you must file your objection/response with the Clerk,,U.S. Bankruptcy Court, The Sylvia Rambo U.S. Courthouse, 1501 North 6th Street, Harrisburg, PA 17102 and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

Date: October 24, 2024

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